



**Matin Emouna**  
Admitted in NY, NJ & CT  
[memouna@emiklaw.com](mailto:memouna@emiklaw.com)

September 29, 2021

Honorable Cathy Seibel  
Charles L. Brieant Jr. Federal Building  
United States Courthouse  
300 Quarropas Street  
White Plains, NY 10601-4150

No objection to this  
application has been  
recieved, and it is hereby  
GRANTED.

SO ORDERED.

Re: United States v. Mehdi Moslem et al.,  
19 Cr. 547 (CS)

  
CATHY SEIBEL, U.S.D.J.

Dear Judge Seibel:

10/1/21

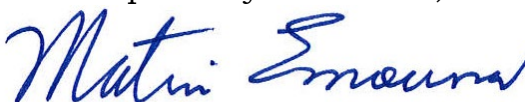
As you are aware, my firm represented Mehdi Moslem in the above-referenced matter until we were recently replaced by the Parlatore Law Group, LLP. Today, I sent Mehdi Moslem's file to the Parlatore Law Group, located at One World Trade Center, Suite 8500, New York, New York.

As you are also aware, during the pendency of this matter, Mehdi and Saaed Moslem sold the property that housed Exclusive Motor Sports, located at 279 Route 32, Central Valley, NY, 10917, and Saaed and Saiedeh Moslem sold the property located at 298-300 Main Street, Cornwall, New York, 12518. Your Honor will recall that the remaining proceeds of those sales are in my firm's IOLA account, and I represented to the Court that I would maintain those funds in my IOLA account until this matter was resolved. Accordingly, my firm is presently in possession of \$93,484.37 belonging to the Moslems. See Exhibit A (schedule of funds).

I received an email from Mr. Parlatore at 9:20 pm on September 28, 2021, which demands that I wire these funds to his firm. See Exhibit B (9/28/21 Parlatore Email). Because I have represented to the Court that I would maintain these funds in my IOLA account, and have done so, out of an abundance of caution and in the interest of affording notice to all parties, I hereby move for entry of an Order directing that the funds in the my firm's IOLA account be released and permitting me to (a) reimburse prior counsel (Ostrer & Associates and Brafman & Associates) for unpaid expenses directly related to their representation of the defendants, in the total amount of \$16,020.62 (see Exhibit C) and (b) send the balance of funds in the amount of \$77,463.75 to the Parlatore Law Group; and for any other relief as the Court may deem just and appropriate.

As always, I greatly appreciate Your Honor's time and consideration in this matter.

Respectfully Submitted,



MATIN EMOUNA

## Exhibit A

## Sale of 279 Route 32, Central Valley, New York

Wire Amount	June 22, 2021	\$428,829.23	
Amsterdam Appraisal		\$ 5,000.00	Appraisal Fee
Hill-n-dale Abstracters, Inc		<u>\$ 488.61</u>	Title Fee
	Balance	\$423,340.62	
The Greens at Woodbury		\$372,632.65	Pay off Spreader Agreement
Levinson, Reineke Kimple		<u>\$ 300.00</u>	Satisfaction Prep Fee.
	Balance in Escrow	\$ 50,407.97	

## Sale of 298-300 Main Street, Cornwall, New York

Wire Amount	July 7, 2020	\$86,152.80
Saeideh Moslem-Taghavi		<u>\$43,076.40</u>
	Balance in Escrow	\$43,076.40

Total Funds in Escrow: \$93,487.37

Exhibit C<sup>1</sup>

- (a) Ostrer & Associates: \$4,954.37 representing out of pocket expenses incurred for transcripts
- (b) Brafman & Associates: \$11,066.25 representing out of pocket expenses incurred for trial transcripts, lodging, and travel expenses

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<sup>1</sup> Should the Court wish to review further documentation of these expenses, I am happy to provide it.